

UNITED FOOD AND COMMERCIAL)	
WORKERS INTERNATIONAL UNION-)	
INDUSTRY PENSION FUND, <i>et al.</i>,)	
)	Civil Action No. 1:17-cv-07125
Plaintiffs,)	District Judge Manish S. Shah
v.)	
)	
INTERNATIONAL MEAT CO., INC.)	
)	
Defendant.)	
)	

Plaintiffs United Food and Commercial Workers International Union-Industry Pension Fund and its Trustees (“Plaintiffs”) and Defendant International Meat Co., Inc. (“International Meat”) respectfully request that this Court enter the proposed Consent Judgment and Order, attached hereto as **Exhibit 1**, and in support state as follows:

- WHEREFORE, the parties respectfully request that the Court enter the attached Consent Judgment and Order and order judgment against the Defendant.

/s/ David Huffman-Gottschling

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Counsel for Plaintiffs

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/s/ Anthony Pinelli, with consent

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Counsel for Defendant

Exhibit 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

<hr/>)	
UNITED FOOD AND COMMERCIAL)	
WORKERS INTERNATIONAL UNION-)	
INDUSTRY PENSION FUND, <i>et al.</i>,)	
)	Civil Action No. 1:17-cv-07125
Plaintiffs,)	District Judge Manish S. Shah
vi.)	
)	
INTERNATIONAL MEAT CO., INC.)	
)	
Defendant.)	
<hr/>)	

CONSENT JUDGMENT AND ORDER

Upon agreement of the parties, Plaintiffs United Food and Commercial Workers International Union-Industry Pension Fund and its Trustees (“Plaintiffs”) and Defendant International Meat Co., Inc. (“International Meat”) hereby stipulate to entry of judgment in favor of Plaintiffs and against Defendant as set forth herein:

WHEREFORE, judgment is hereby entered in favor of Plaintiffs and against Defendant; and it is

FURTHER ORDERED, that Plaintiffs are awarded and Defendant shall pay to Plaintiffs a judgment in the total amount of \$122,932.06, which is comprised of \$91,153.00 in withdrawal liability, \$6,380.09 in interest accrued as of February 26, 2018, \$18,230.60 in liquidated damages, and \$7,168.37 in attorneys’ fees and costs; and it is

FURTHER ORDERED, that this Consent Judgment and Order is subject to execution in any court of competent jurisdiction, and any and all terms of this Consent Judgment and Order may be enforced by Plaintiffs in any court of competent jurisdiction; and it is

FURTHER ORDERED, that should Defendant fail to comply with any terms of this Consent Judgment and Order, Plaintiffs may, in addition to pursuing remedies provided under Fed. R. Civ. P. 69, reopen this case upon motion to this Court and notice to the Defendant, and may at that time ask for further appropriate and/or injunctive relief.

Entered: _____

UNITED STATES DISTRICT JUDGE

AGREED:

/s/ David Huffman-Gottschling
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